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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHAEL MINDEN & THERESA MINDEN,

Plaintiffs,

vs.

ALLSTATE PROPERTY AND CASUALTY
INSURANCE COMPANY, an Illinois
Corporation; DOE INDIVIDUALS 1-10 and ROE
ENTITIES I-X,

Defendants.

Case No.: 2:21-cv-00151-APG-BNW

**STIPULATION TO EXTEND
DISCOVERY DEADLINES**

(Third Request)

Pursuant to LR IA 6-1 and LR 26-3, Plaintiffs, Michael and Theresa Minden (collectively, “Plaintiffs”) and Defendant, Allstate Property and Casualty Insurance Company (“Defendant”), by and through their respective counsel, hereby stipulate to extend the discovery deadlines. This is the second request to extend the discovery deadlines. This stipulation is submitted within 21 days of the initial expert deadline. Under LR 26-3, the stipulation is within 21 days because Plaintiffs’ counsel was involved in back-to-back jury trials that extended to November 16, 2021. Also, Plaintiffs’ counsel’s wife’s grandfather passed away and counsel has been helping his wife’s family through that process. Because of this, Plaintiffs have been delayed in submitting this stipulation and finalizing the information needed the damages expert reports.

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1. Discovery completed.

- Plaintiffs and Defendant have both produced their initial disclosures, and both parties have supplemented their disclosures.
- Defendant propounded Interrogatories and Requests for Production to Plaintiffs, and Plaintiffs have responded to the Interrogatories and Requests for Production.
- Plaintiffs propounded Interrogatories and Requests for Production to Defendant, and Defendant has responded to the Interrogatories and Requests for Production.
- Defendant has served subpoenas duces tecum on third-parties, Dean Roofing Co., DL Denman Construction, Inc., J&J Contracting, LLC, Kalb Industries of Nevada, Ltd., Precision Roofing, Inc., Prestige Roofing, Inc., Roberts Roof and Floor, Inc., and Terravita Home Construction Co.
- Defendant has deposed Plaintiffs and third-party, Prestige Roofing, Inc.

2. Discovery that remains to be completed.

- Plaintiffs intend to depose Defendant's Rule 30(b)(6) witness.
- Both Plaintiffs and Defendants intend to disclose experts and/or rebuttal experts and the parties will depose the experts.
- Both Plaintiffs and Defendant may propound further written discovery.
- Plaintiffs and/or Defendant may take the depositions of certain third-parties.

3. The reasons why the discovery was not completed within the time limits set by the scheduling order.

Plaintiffs' counsel was involved in back-to-back jury trials that extended to November 16, 2021. Also, Plaintiffs' counsel's wife's grandfather passed away and counsel has been helping his wife's family through that process. Plaintiffs are disclosing their wind expert and his report on November 22, 2021. However, because of the identified delays, Plaintiffs need more time in finalizing the experts report(s) regarding damages. This extension is requested in good faith and not to delay the proceedings or prejudice any party.

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4. Proposed schedule for completing all remaining discovery.

	Current Deadline	Proposed Deadline
Initial Expert Disclosure ¹	November 22, 2021	December 3, 2021
Rebuttal Expert Disclosure	December 22, 2021	January 3, 2022
Close of Discovery	January 21, 2022	February 2, 2022
Dispositive Motions	February 22, 2022	March 4, 2022
Pretrial Order	March 24, 2022	April 4, 2022²

Dated this 22nd day of November, 2021.

REID RUBINSTEIN & BOGATZ

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH, LLP

/s/ Michael S. Kelley

/s/ Jonathan W. Carlson

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATE: November 23, 2021

¹ Plaintiffs shall disclose their wind expert on November 22, 2022. The extended deadline shall be for disclosure of Plaintiffs' expert regarding damages.

² Thirty days following the close of dispositive motion deadline of March 4, 2021 is Sunday, April 3, 2022, a non-judicial day. Monday, April 4, 2022 is the next judicial. If a dispositive motion is filed, this deadline shall be suspended until 30 days after this court rules on the dispositive motion.

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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of November, 2021, our office served a copy of the foregoing **STIPULATION TO EXTEND DISCOVERY DEADLINES** upon each of the following parties by electronic service in accordance with Administrative Order 14-2.

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/s/ Amy M. Scott

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